REMARKS

In the Office Action, claims 39-61 were rejected. Of these claims, claims 39 and 52 are in independent form. By way of this response, claims 39 and 52 have been amended. Applicants respectfully submit that no new matter has been added by way of these amendments. Accordingly, claims 39-61 are pending and at issue.

The Office Action rejected claims 52-61 under 35 U.S.C. §112 for being indefinite. Applicants respectfully traverse these rejections.

The Examiner indicates that claim 52 is rendered indefinite from the clause "without utilizing the controller" because "[i]t is unclear whether Applicant intends to claim that a controller is not present at all in the system or merely that the trigger signal for the reflex function is not processed by the controller between triggering and executing." Applicants have amended claim 52 to remove any ambiguity perceived by the Examiner.

Accordingly, by way of this response, claim 52 has been amended from "without utilizing a controller" to "without requiring input from a controller." Claim 52 is intended to cover *systems* with a controller and *systems* without a controller as long as the system includes an *output module* structured to execute a reflex function without requiring input from a controller (in addition to the other limitations of claim 52). That is, the output module does not require any processing of the trigger signal from a controller or any other input from the controller in order for the output module to execute the reflex function. As stated in the specification, "the present invention allows direct communication between modules regardless of a controller 20 being present or not" (Page 5, lines 22-23). Further, the specification discloses a system that does not utilize or otherwise require any input signal from a controller in order for the output module to execute the reflex function. Accordingly, Applicants respectfully submit this rejection is no moot.

The system disclosed in Dummermuth (U.S. Pat. 6,073,053) requires a central processor 12 to enable the reflex function via 70' (see col. 4, ll. 25-38; col. 5, ll. 18-27; and FIG. 3). Dummermuth does not show the ability to execute the reflex function without requiring an enabling input from a controller.

For the above stated reasons, Applicants believe claim 52 is definite. In addition, Dummermuth fails to teach or suggest at least one of the elements of claim 52, therefore Dummermuth does not anticipate claim 52. Accordingly, Applicants believe claim 52 is in condition for allowance, and reconsideration is respectfully requested.

Claims 53-61 depend either directly or indirectly from claim 52. Therefore, Applicants believe claims 53-61 are allowable for at least the reasons stated above with reference to claim 52, and reconsideration is respectfully requested.

The Office Action rejected claims 39-42, 44, 46, 47, 49, 50, 52-57, 59 and 60 under 35 U.S.C. §102 as being anticipated by Dummermuth. Applicants respectfully traverse these rejections.

Claim 39 recites the limitation "the output module including firmware configurable with a first reflex function at a first time and a second reflex function at a second time." (Support for these amendments may be found in the specification on page 6, lines 3-15.)

Dummermuth (6,073,053) only shows one reflex function (a delay for a duration) that can be programmed for different *times* (see col. 4, l. 39 - col. 5, l. 17; and FIG. 3). Dummermuth does not show the ability to change the reflex *function* itself (e.g., from a comparison function to an edge detection function via firmware).

The Examiner contends that Dummermuth teaches firmware configurable with first reflex function of a timer and second reflex function of an edge detector in col. 4, lines 50-65. The Applicants respectfully disagree. Col. 4, lines 50-65 of Dummermuth merely teaches that the clock input to the delay circuit may be internal or external to the delay circuit. Firmware is software instructions that are inserted into programmable memory, thus becoming a part of a circuit or device (see http://www.m-w.com/cgi-bin/dictionary?book=Dictionary&va=firmware and http://searchsmallbizit.techtarget.com/sDefinition/0,,sid44_gci212127,00.html). There is no mention of firmware anywhere in Dummermuth, let alone an output module including firmware configurable with multiple reflex functions.

Because Dummermuth fails to teach or suggest at least one of the elements of claim 39, Dummermuth does not anticipate claim 39. Accordingly, Applicants believe claim 39 is in condition for allowance, and reconsideration is respectfully requested.

Claims 40-42, 44, 46, 47, 49, 50, 52-57, 59 and 60 depend either directly or indirectly from claim 39 or claim 52. Therefore, Applicants believe claims 40-42, 44, 46, 47, 49, 50, 52-57, 59 and 60 are allowable for at least the reasons stated above with reference to claim 39 and claim 52, and reconsideration is respectfully requested.

The Office Action rejected claims 43, 45, 48, 51, 58 and 61 under 35 U.S.C. §103(a) as being obvious over Dummermuth in view of Edwards (US Pat. 5,938,754). Applicants respectfully traverse these rejections.

Claims 43, 45, 48, 51, 58 and 61 depend either directly or indirectly from claim 39 or claim 52. Therefore, Applicants believe claims 43, 45, 48, 51, 58 and 61 are allowable for at least the reasons stated above with reference to claim 39 and claim 52, and reconsideration is respectfully requested.

In view of the foregoing amendments, reconsideration of the application is respectfully requested.

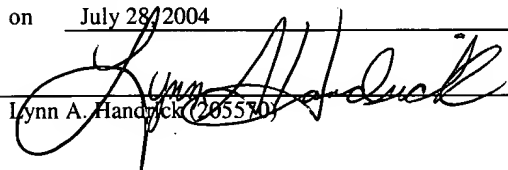Respectfully submitted,

Dated: July 28, 2004   By: _____

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